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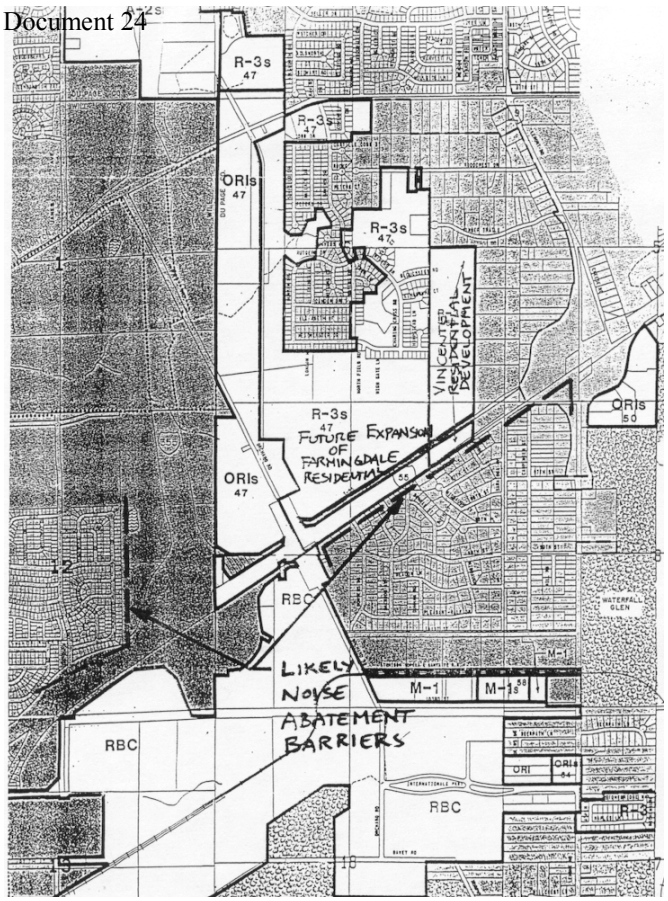

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WILL COUNTY LAND USE DEPARTMENT
58 East Clinton Street • Suite 500 • Joliet, Illinois 60432

February 28, 2001

Illinois Department of Transportation
Division of Highways – District One
201 West Center Court
Schaumburg, IL 60196-1096

Attn: Mr. John P. Kos, P.E., District Engineer

Subject: FAP Route 340, I-355 South Extension from I-55 to I-80: **Noise Attenuation**

Dear Mr. Kos:

This letter is to call your attention to several concerns regarding Section 4.13 ("Noise") of the Supplemental Final Environmental Impact Statement and Section 4(f) Evaluation, also known as the SFEIS, for the I-355 South Extension.

4.32 Noise levels were predicted for the roadway, with existing levels measured by receptors for the road segment in question. The first concern involves an acknowledged deficiency within the noise modeling methodology; namely, that only future *traffic* noise is predicted by the noise model, while the present-day measurements included both traffic *and* background (or ambient) noise levels. The projected Average Daily Traffic figures, however, were partially dependant on anticipated growth and development in Will County inherent in the population forecasts – development that will influence future ambient noise levels. The year 2020 design-year noise levels are therefore incomplete, and seem to us problematic in assessing the true need for noise attenuation barriers.

This, in turn, raises the following issues:

4.33
1) Who will be responsible for monitoring noise levels in the future?
2) What levels will be acceptable?

6.1
3) Who will determine acceptability?
4) Who will design, pay for, and construct future mitigation measures?

Table E-1 references an "Exhibit 4-14" to ascertain Receptor Group Barrier Labels, yet we could not identify this Exhibit within the SFEIS. Without an explanation of Barrier Labels A, B, C, etc., the locations of barriers were determined graphically from examining Exhibit 4-7. Based on that mapped representation, we have some concerns over specific locations where barriers do not appear to have been proposed. These include:

BUILDING (815) 727-8634 | ENGINEERING (815) 740-8140 | PLANNING (815) 727-8430 | WASTE SERVICES (815) 727-8834 | ZONING (815) 727-8850 | MAIN FAX (815) 727-8638

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4.34 a) Illinois Route 171 – The measurement at Receptor 32 (see Exhibit 4-6 and Table E-1) is alarming. We understand the explanation given for the supposed ineffectiveness of a barrier at this location, though we continue to have concerns regarding the lack of consideration of future ambient noise levels. However, we see no evidence for the statement that "a continuous wall is not possible at this location" given in the footnote of Table E-1. "*Not possible*" is different from "*not warranted*," and clarifying the distinction will help with future analyses and abatement options, should they become necessary.

4.35 b) I-80/I-355 South Extension interchange – Although the SFEIS says the noise here will decline, it seems to us this will not in fact be the case. The noise generated by both I-80 and the new roadway needs to be combined for an overall noise level. When combined, we feel that additional barriers should be constructed around Receptors 3, 12, 23, 24, 25, and 26 (as shown in Exhibit 4-6) along the southern and southeastern edge of the interchange/ramp system, and not just the western segment.

4.36 c) 135th Street – The predicted noise levels for Receptors 50 and 51 from Table E-1 also generate concern about the level of noise created by I-355 at this crossing. Barrier construction should be considered at this overpass to reduce impacts to the surrounding area. Table E-1 indicates a "Noise Barrier A," but again, without Exhibit 4-14, we see no correspondence to what this means.

Thank you for your consideration. If any of these points need clarification or if you wish to discuss them further, please feel free to contact Mike Shay, Senior Planner, at (815) 727-8430 or at mshay@willcounty-landuse.com.

Sincerely,

Tyson Warner, AICP
Director, Planning Division

trw/mjs

cc: Joseph L. Mikan, Will County Chief Executive
Ann Dralle, Will County Board Member, District #3
Terri Wintermute, Will County Board Member, District #4
Ron Grotovsky, Director, Will County Land Use Department
Mike Shay, AICP, Senior Planner, Will County Land Use Department

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RESOURCE SYSTEMS GROUP
INCORPORATED

SUMMARY

We have reviewed the *Draft Supplemental Final Environmental Impact Statement for FAP Route 340 (I-355 South Extension* of December 2000 ("DSFEIS"). The review included not only the DSFEIS document, but also supporting modeling data and files provided by the Chicago Transportation Study (CATS) and Northeastern Illinois Regional Planning Commission (NIPC).

Based on this review, we conclude:

1) The DSFEIS should include a section on the very significant local impacts of the Tollroad/Freeway alternative. For example, CATS model results show afternoon peak period volumes on 127th Street east of the proposed intersection are projected to be 161 percent higher with the I-355 extension than without. The DSFEIS should document these highly impacted areas and include mitigation strategies.
2) The great majority (three quarters) of the traffic forecast to cross the Des Plaines River on I-355 in 2020 is from crossings that do not take place in the No-Action scenario, i.e. are "induced" by the new road As providing bridge capacity is expensive in both financial and environmental terms, a cost-benefit analysis should be done.
3) Except for bridge crossings, the CATS model fails to adequately capture induced travel demand. It actually predicts lower vehicle miles of travel (VMT) in the Tollroad/Freeway scenario than in the No-Action scenario. This is contrary to economic theory and to published research on induced travel.
4) The source of the CATS model's induced travel demand problem appears to lie in the Trip Distribution step. CATS uses an "intervening opportunities" model not used by any other region in the U.S. which produces incorrect trip length distributions.
5) The DSFEIS relies on 2020 land use scenarios which imply a radical separation of jobs and housing that is contrary to historical experience in the region. This assumption is the basis for a "need" for a huge investment in highway infrastructure in order to move people from Will County to jobs and services outside. Essentially the same land use scenario also is applied for all scenarios.
6) All of the DSFEIS scenarios are focused on solving this artificial problem of moving large number of projected Will County residents to projected DuPage County jobs and services. In contrast, the Action Plan developed by New Alternatives is a comprehensive approach to addressing transportation problems in Will County. We are working with staff of the Department of Civil and Materials Engineering of the University of Illinois at Chicago to model the Action Plan in 2020 along with the No-Action and Tollroad/Freeway scenarios. We are optimistic that the Action Plan will be shown to offer significant benefits to the residents of Will County while avoiding the problems caused by the Tollroad/Freeway alternative.

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